

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Honorable Steven W. Rhodes
)	

**LIMITED PRELIMINARY RESPONSE
OF DETROIT RETIREMENT SYSTEMS
TO NOTICE OF PROPOSED DATES AND DEADLINES**

The Police and Fire Retirement System of the City of Detroit (“PFRS”) and the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”) respectfully state:

1. While the Court’s *Notice of Proposed Dates and Deadlines* [Docket No. 190] (the “Notice”) generally invites comments to be made at the status conference scheduled for August 2, 2013, the Retirement Systems wish to hereby identify one particular concern regarding the Notice, to permit the Court to consider this issue in advance of the status conference.¹

2. Specifically, the Notice proposes a deadline of August 19, 2013, for the filing of Eligibility Objections, but it does not require the City of Detroit (the “City”) to file any response to such Eligibility Objections prior to the parties commencing discovery. The parties are required to file pre-trial briefs, but that proposed date is a mere six days prior to the proposed trial date.

¹ The Retirement Systems reserve the right to provide additional comments to the Court at the status conference.

3. The Retirement Systems submit that, prior to scheduling discovery deadlines and other pre-trial dates, a deadline should be scheduled for the City to file responses to the Eligibility Objections, in order to fairly apprise parties of the City's positions on the relevant issues. Otherwise, parties filing Eligibility Objections will be required to engage in discovery blindly, without necessarily knowing and understanding fully the City's position on the relevant issues until discovery has closed and just six days before trial. The Retirement Systems respectfully submit that such a process would not be fair and consistent with principles of due process.²

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
Evan J. Feldman (P73437)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com

Dated: August 1, 2013

*Counsel to the Police and Fire Retirement System of
the City of Detroit and the General Retirement
System of the City of Detroit*

² This Response is filed subject to the reservations of rights in the Appearances filed by the undersigned counsel in this case, as well as the arguments articulated in the Objection of the Retirement Systems to the Debtor's Stay Motions [Docket No. 141] contesting the Court's subject-matter jurisdiction.